

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CHIRAG SHAH,)
)
Plaintiff,)
)
v.) CIVIL ACTION No. 1:13CV1481
)
SOUTHWEST AIRLINES, et al)
)
Defendant.)

PLAINTIFF'S SUPPLEMENTAL RULE 26(a)3 DISCLOSURES

COMES NOW the Plaintiff, by counsel, and makes the following supplemental disclosures:

Witnesses

1. Chirag Shah
2. Stan V. Smith, Ph.D.
3. Charlotte Bryan
4. Ray A. Perry, TSA Investigating Officer
5. Officer T. White, A552 Metropolitan Washington Airports Authority Police Department
6. Akilesh Muralidharan
7. George C. Cannon, Southwest Pilot
8. Regina Paschall, Southwest Flight Attendant
9. Shannan Ramos, Southwest Flight Attendant
10. Ava Alley, Southwest Flight Attendant
11. Ruby Boykin, Southwest Customer Service
12. Mary Mortensen, Southwest
13. Any witness identified by Defendant.

Exhibits

1. April 16, 2013 reply email at 10:50 a.m. to Plaintiff from Defendant
2. April 16, 2013 reply email at 12:31 p.m. to Plaintiff from Lisa Keegan, Southwest Airlines
3. May 16, 2013 reply email at 3:09 p.m. to Plaintiff from Elizabeth Behrens, Specialist, Customer Advocacy

4. Phone Notes 213659802352, Bates SWA000001 - SWA000002
5. Flight Operations IR Summary Report, filed by George Cannon, Bates SWA000003-SWA000005
6. Incident Info IR # 173475, filed by Shannon Ramos, Bates SWA000006-SWA000008
7. Incident Info, IR # 173349, filed by Regina Paschall, Bates SWA000009-SWA000011
8. Incident Info, IR # 173343, filed by Ava Alley, Bates SWA000012-SWA000013
9. Ground Ops MOM Irregularity Report, filed by Ruby Boykin, Bates SWA000014 - SWA000018
10. IR #042587, Bates SWA000019-SWA000020
11. Mom Report for Monday April 15, 2013, SWA 000021-SWA000022
12. Chapter 21, Passenger/Cargo Handling, SWA000023-SWA 000025
13. Southwest Airlines Contract of Carriage - Passenger, Sixth Revised, SWA000026-SWA000062
14. 21.6.4 Security Request Guidelines, SWA 000063-SWA000070
15. Flight Attendant Manual, SWA000071-SWA000082
16. Training - Inflight Initial Leader's Guide, SWA000083 - SWA000118
17. Training - Inflight Initial Training Leader's Guide, SWA000119 - SWA000198
18. CIRRUS >> Itinerary, SWA000199 - SWA000200
19. CIRRUS >> Remark, SWA000201 - SWA000204
20. Southwest Airlines Flight Operations Training Manual, SWA000228-SWA000319
21. Email from Trey Shaw dated April 30, 2013, SWA000320 - SWA000321
22. Email from Elise May dated April 30, 2013, SWA000324-SWA000325
23. Email from Ted Thornton dated May 3, 2013, SWA000326-SWA000327
24. Email from Elizabeth Behrens, dated May16, 2013, SWA000328
25. Email from Mary Mortensen, dated May 16, 2013, SWA000329 - SWA000331
26. Email from Ruby Boykin dated April 15, 2013, SWA000336-SWA000338
27. SWA000342 - SWA000345
28. Chirag Shah's Resume
29. Stan Smith's Report
30. Stan Smith's CV
31. Charlotte Bryan's Report
32. Charlotte Bryan's CV
33. Rebuttal Report of Charlotte Bryan
34. Metropolitan Washington Airports Authority Police Department Airline Incident Report #R201300787
35. Stipulation of Southwest Finances
36. TSA Incident Report issued by Inspector Ray A. Perry (To be provided upon receipt)
37. Any other TSA documents received related to this incident responsive to Plaintiff's FOIA Request (To Be provided upon receipt)
38. Any and all deposition transcripts taken in this matter.
39. Any and all documents identified by Defendant.

CHIRAG SHAH
By Counsel

/s/
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CERTIFICATE OF SERVICE

I certify that on the 24th day of June, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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